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|---|---|
| **From:** | Smith, Yvonne |
| **To:** | Mark Seaman |
| **Cc:** | Groh, Nathan; Rogers, Tim; Regan, Tara; Brad.Azeltine@iowadot.us; brittany.barrientos@stinson.com; George Lynn; Chiccine, Catherine |
| **Bcc:** | Kennedy, Sharon |
| **Subject:** | RE: Designation of proposed Project Coordinators - Former Citizens Gas and Electric MGP site Council Bluffs, IA |
| **Date:** | Tuesday, November 3, 2020 6:43:00 AM |
| **Attachments:** | 2020-10-29 Citizens Gas Designation of Project Coordinator.pdf<br>image001.png |

Mark,
Thank you for submitting the Project Coordinator names and applicable qualifications ahead of schedule and in line with the ASAOC. Your credentials/qualifications and experience reflect that your designation as co-Project Coordinator and Contractor with ERM (selected by Respondents) is appropriate for the performance of the EE/CA on the former Citizens Gas and Electric MGP. I will submit this email along with the enclosed letter for EPA records with a date stamp of 10/29/2020.

Respectfully,


**Yvonne M. Smith | On-Scene Coordinator**

Response, Removal and Oil Preparedness Section
Superfund Emergency Management Division
U.S. Environmental Protection Agency, Region 7
P 913-551-7795 | 11201 Renner Blvd., Lenexa, KS 66219
smith.yvonne@epa.gov


**From:** Mark Seaman <Mark.Seaman@erm.com>
**Sent:** Thursday, October 29, 2020 5:33 PM
**To:** Smith, Yvonne <smith.yvonne@epa.gov>
**Cc:** Groh, Nathan <Nathan.Groh@blackhillscorp.com>; Rogers, Tim <Tim.Rogers@blackhillscorp.com>; Regan, Tara <Tara.Regan@blackhillscorp.com>; Brad.Azeltine@iowadot.us; brittany.barrientos@stinson.com; George Lynn <George.Lynn@erm.com>
**Subject:** Designation of proposed Project Coordinators - Former Citizens Gas and Electric MGP site Council Bluffs, IA

Yvonne,

Thanks again for the opportunity to provide introductions, a brief overview of the project,

and to talk through related communication elements in our conference call last week. Per our discussion, please find attached for your review our correspondence providing designation of the proposed Project Coordinator as detailed in Section VII item 39 of the Administrative Settlement Agreement and Order on Consent (ASAOC), CERCLA Docket No. 07-2020-0089.

Please let me know if you have any questions or just give me a call to discuss in more detail.

Best Regards,

Mark E. Seaman, PE
Principal Consultant

**ERM**
345 Woodcliff Drive, 2nd Floor | Fairport, New York 14450
**M** 515-681-1025 | **E** Mark.Seaman@erm.com
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29 October 2020

Yvonne M. Smith
On-Scene Coordinator
U.S. Environmental Protection Agency, Region 7
Response, Removal and Oil Preparedness Section
Superfund Emergency Management Division
11201 Renner Blvd., Lenexa, KS 66219

Delivered by email; smith.yvonne@epa.gov

Subject: Designation of Project Coordinator related to former Citizens Gas and Electric manufactured gas plant (FMGP) site Council Bluffs, Iowa
CERCLA Docket No. 07-2020-0089

Dear Ms. Smith:

We appreciate the opportunity to discuss the development of the Engineering Evaluation Cost Analysis (EECA) for the former Citizens Gas and Electric manufactured gas plant (FMGP) in Council Bluffs, Iowa, on our conference call last week. Per our discussion, this letter serves to provide designation of the proposed Project Coordinator as detailed in Section VII item 39 of the Administrative Settlement Agreement and Order on Consent (ASAOC), CERCLA Docket No. 07-2020-0089.

Black Hills/Iowa Gas Utility Company, LLC (BHE) proposes a primary and secondary Project Coordinator detailed as follows;

**Primary Project Coordinator**
Nathan Groh (BHE)
Environmental Manager
1301 W 24th Street
Cheyenne, WY 82001
Office: 307-778-2115
Mobile: 402-660-3232
Email: Nathan.Groh@blackhillscorp.com

**Secondary Project Coordinator**
Mark E. Seaman (Environmental Resources Management Inc. (ERM))
Principal Consultant
345 Woodcliff Drive
Fairport, New York 14450
Mobile: 515-681-1025
Email: Mark.Seaman@erm.com

If you should have any questions, or if we can provide any additional information, please feel free to contact Mark Seaman, ERM Project Manager (515-681-1025 or Mark.Seaman@erm.com) or Nathan Groh, BHE Environmental Manager (307-778-2115 or Nathan.Groh@blackhillscorp.com).

Sincerely,
***Environmental Resources Management, Inc.***

Mark E. Seaman, P.E.
*Principal Consultant*

*Cc:* Nathan Groh (Nathan.Groh@blackhillscorp.com)
Tara Regan (Tara.Regan@blackhillscorp.com )
Tim Rogers (Tim.Rogers@blackhillscorp.com)
Brad Azeltine (Brad.Azeltine@iowadot.us)
Brittany Barrientos (brittany.barrientos@stinson.com)

*Attachment: Mark Seaman Professional Profile*

# Mark Seaman, P.E.

**Mr. Mark Seaman** entered the environmental field in 1982, accumulating over 38 years of project management and project engineering experience within the industrial and environmental consulting sectors, performing projects throughout the United States and abroad. His expertise includes site investigation layout and implementation, remedial technology evaluation, selection, and implementation, design and execution of remedial excavations, and compilation of construction plans.

Mr. Seaman has specialized in the investigation and remediation of former manufactured gas plants throughout the United States and abroad for over 25 years. Mr. Seaman has worked on more than 75 MGP site investigation projects, and 18 MGP remedial action projects in the states of Kansas, Missouri, Michigan, Nebraska, Iowa, New York, California, Washington, and Indiana. He has worked on MGP sites within CERCLA, State Lead, and Voluntary Cleanup programs. His role in these projects has included project and personnel management, adherence to regulatory-driven schedules and budgets, assessment of client liabilities, regulatory negotiations, public meetings, regulatory reporting, construction management, site investigation layout and implementation, remedial technology evaluation and selection, cost estimating, engineering design of ground water, soil treatment systems, DNAPL and LNAPL recovery systems, design and execution of remedial excavations, compilation of construction plans, and the development of risk management strategies.

In addition, Mr. Seaman has significant experience in the design, implementation, and execution of large scale environmental soil excavation projects which have included on-site and off-site treatment of soils using thermal and chemical thermal treatment, soil conditioning, stabilization, co-burning at utility power plants, and biologic treatment. These projects have include the development of regulatory work plans, public relations plans, odor and noise mitigation plans, air monitoring plans, construction plans, and re-development plans for final site use.

### Professional Affiliations & Registrations

- Licensed Professional Environmental Engineer (Iowa #14232)
- Licensed Professional Environmental Engineer (Nebraska #E-10686)
- National Society of Professional Engineers
- Iowa Engineering Society
- American Society of Mechanical Engineers
- Environmental Professionals of Iowa
- National Water Well Association
- Iowa State University Alumni Association

### Fields of Competence

- Manufactured Gas Plant site investigations, liability assessments, remediation of soil and groundwater, and redevelopment planning
- Construction management
- Project and program management
- Remediation technologies evaluations and implementation
- Design and implementation of soil and ground water remedial actions and treatment systems
- Soil and ground water investigation design and implementation
- Litigation support

### Education

- B.S., Mechanical Engineering, Iowa State University, 1982
- 40-Hour OSHA HAZWOPER Training, 1990
- 8-Hour OSHA Management Training, 1993
- Annual 8-Hour OSHA HAZWOPER Refresher Training
- OSHA Excavation and Trenching Safety Regulations Competent Person Training, 1994
- OSHA Confined Space Entry for Competent Entrant, Attendant, and Entry Supervisor, 1994

### Key Industry Sectors

- Utilities
- Chemical
- Manufacturing

## Honors & Awards

- 1995 Sullivan Award Recipient, bestowed by the Board of Directors of Groundwater Technology.

## Publications and Presentations

- Mark Seaman, Maureen Leahy, and Cathy Weber. "Retrospective of Remediation of Tars under the U.S. Superfund Program." Battelle Remediation of Chlorinated and Recalcitrant Compounds, Monterrey, CA, May 2006.
- Mark Seaman and Jay Dablow. "Fast-Track Installation and Operation of a Full-Scale In Situ Ozonation System at a Former MGP Site." Gas Technologies Institute, Conference on Site Remediation Technologies & Environmental Management Practices in the Utility Industry, Orlando, FL. 2000.
- Mark Seaman and Chris Nelson. "Ozone Sparging for the Remediation of MGP Contaminants," Fourth International Symposium on In Situ and On-Site Bioremediation, New Orleans, LA. 1997.
- Mark Seaman. "Key City Gas Light Site Remedial Action Case History," Environmental Management Conference, Midwest Gas Association, Chicago, IL. 1994.

## Key Projects

**Remedial Action Former MGP Sites, Nebraska**
**2010 to present, Senior Project Manager**
Responsible for compilation of applications, investigation work plans, and Remedial Action Plans (RAPs) within the Nebraska Department of Environmental Quality (NDEQ) Voluntary Cleanup Program (VCP). Designed and executed the investigation and remediation of two former MGP sites on an expedited basis in 2011/2012. Project remedial actions complete, monitoring and closure activities are on-going.

**Innovative Technology, Utility Site, Illinois, 2009/2010.**
**Senior Consultant**
Supported evaluation of remedial options, cost development, and implementation of bench scale pilot testing for soil stabilization of MGP source materials. Full scale pilot testing targeted for completion in 2011. Soil stabilization is targeted for treatment at depths up to 55 feet bgs.

**Remedial Action at Former MGP Site, Iowa, 2005.**
**Project Director**
Responsible for design and implementation of soil remedial actions related to a former MGP site in Sioux City, IA. Work scope included excavation, on-site conditioning, off-site transportation of soils for thermal treatment, and restoration of utility site using thermally treated soils and imported materials. Excavated and thermally treated Approximately 45,000 tons of impacted soils. Completed project on fast track restoration schedule.

**Remedial Action at Former MGP Site, Australia, 1999.**
**Technical Advisor/Director**
Responsible for design and implementation of soil remedial actions related to former MGP site in Melbourne. Work scope included excavation, on-site conditioning, evaluation of treatment options, on-site treatment, and off-site disposal of excavated soils. In addition, provided technical support in joint venture with utility to perform co-burning of impacted soils at an operating utility power plant. Excavated and treated estimated 220,000 cubic meters of soils. Completed remedial action prior to 2000 Olympic Games in Sydney, with portions of those games taking place in Melbourne.

**Ground Water Treatment System for Municipal Water Supply, Nebraska CERCLA, 2003 and 2004. Project Manager**
Directed design, installation, and operation of a ground water treatment system to address TCE and PCE impacts to city water supply. $2-million design/build project for USEPA Region VII provided for design of 1,250-gallon-per-minute (gpm) treatment system, using over 3,500 lineal feet of HDPE piping routed throughout city's downtown area. Work activities included working within the railroad rights-of-way and conducting horizontal borings beneath railroad without interrupting normal operation of heavily traveled freight lines. Completed project on very aggressive schedule prior to federal deadline, with startup and operation of system exceeding our client's goals.

**Various Former MGP Sites, Sites in Iowa and Illinois, 2000 to 2004. Program Director**
Developed program for oversight and execution of investigation, assignment of liability cost, risk evaluation, remedial actions evaluation, and closure plan development for Midwestern utility. Provided for management of 21 former MGP sites.

**DNAPL Recovery, Utility Site, Iowa CERCLA, 1998 to 2002. Project Manager and Lead Engineer**
Developed in-situ remedial options for MGP-impacted soil and ground water. Designed and implemented us of a DNAPL recovery system operated in conjunction with groundwater recovery and ozone sparge treatment at this CERCLA site. Work scope included the design, installation, performance evaluation, and reporting to Region VII EPA.

**RFI Work Plan Development, Execution, and Pilot Testing, Coking facility, Pueblo, Colorado, 2006 Senior Consultant**
Supported the evaluation of a retired coking facility operation at a confidential client steel mill facility to develop the RFI Work Plan and related remedial pilot testing associated with the RCRA site. The Coke Plant covered approximately 20 acres, and was comprised of four generally distinct areas. These areas were the Coal Washery, the Coke Oven Batteries, the By-Products Area, and the Benzol Yard. The facility and related wastes were intact, with the full scope of the RFI designed to address potential areas of impact.

**Remedial Action, Utility Site, New York, 2000-2001. Technical Director**
Responsible for implementation of soil remedial actions related to a former MGP site in New York State. Work scope included working within temporary structure, excavation, on-site conditioning, evaluation of treatment options, on-site treatment, and off-site disposal of excavated soils.

**Site Investigation, Utility Sites, Sites in Iowa, Michigan, Nebraska, and Kansas, 1998. MGP Specialist**
Performed review of available Phase I and Phase II investigation data and developed ranking of 29 former MGP sites for potential risk or liability to client. Ranking included development of work scopes for each site for future investigation or remedial action, and development of related costs. Reviewed feasibility of remedial actions for given sites and applied to risk-based ranking, as well as to development of costs. Work activities included ranking, work scope development, cost of investigation, cost of remediation, and schedule.

**Assessment and Remediation, Utility Site, Iowa, 1998. Project and Construction Manager**
Responsible for excavation, conditioning, and treatment of PAH-contaminated soil. Work scope involved conducting assessment, directing initial screening of remedial alternatives, and developing construction specifications and engineering design plans for treating soil and ground water. Also supervised construction for shoring installation, test trenching, pilot testing, and subsequent excavation. Approximately 38,000 tons of excavated material was processed for final treatment via co-burning in utility boiler.

**Litigation Support for CERCLA Site, Confidential Client, Washington, 1998.**
Provided litigation support to confidential client with regard to a former manufactured gas plant site in Washington. Work included review of historic data, review of environmental analytical data, development of fate and transport models, development of chemical process diagrams, and participation in depositions from opposing council.

**Assessment and Remedial Action, MGP Site, San Diego, CA, 1995 to 2000. MGP Specialist and Technical Advisor**
Collaborated in design and performance of investigation of former MGP site covering nine-city-block area in downtown San Diego. Following performance of site investigation, compiled feasibility analysis and cost comparison for remedial options, and provided technical

support on-site for site excavation. Remedial option included extensive shoring, de-watering, water treatment, off-site thermal treatment, with on-site staging, conditioning, and debris segregation. Selected remedial option provided for excavation of an estimated 50,000 cubic yards of PAH-impacted soils using both on-site and off-site thermal desorption treatment.

**Remedial Action, Utility Site, Iowa CERCLA Project, 1995. Project and Construction Manager**
Responsible for excavation, conditioning, and treatment of PAH-contaminated soil on site. Included performing site soil remedial action, installing and operating ground water control system, pilot testing of ozone sparging technologies for ground water restoration, conducting ambient air monitoring, participating in public availability sessions, and performing biological treatment studies. Processed approximately 25,000 tons of excavated material for final treatment via co-burning in utility boiler.

**Interim Remedial Actions and RCRA Closure, Iowa RCRA Project, 1996 to Present. Project Manager**
Managed design, installation, and operation of interim remedial system used in treatment of chlorinated solvent-impacted soils and ground water. Included design and installation of air sparge and soil vapor extraction system complete with off-gas treatment. Managed design and implementation of interim action to induce reductive dechlorination (a biological treatment method) by injection of carbon amendment into saturated and unsaturated soils on site. In conjunction with interim action, summarized investigation and remedial activities in site RFI/CMS report submittal to USEPA Region VII.

**Site Investigation and Remedial Action, Former MGP and CERCLA Site, Iowa, 1996. Project and Construction Manager**
Performed pilot testing for source removal, test trench excavation, and full-scale excavation of PAH-impacted soil. Excavated approximately 18,000 tons of soils, and processed for final treatment via co-burning in a utility boiler.

**Innovative Technology, Utility Site, Iowa CERCLA, 1998 to 2002. Project Manager and Lead Engineer**
Developed in-situ remedial options for MGP-impacted soil and ground water. Managed and implemented use of an innovative technology, ozone sparging, working through initial pilot testing, full scale implementation, and system de-commissioning. Work scope included the design, installation, performance evaluation, and reporting to Region VII EPA.

**Chemical Oxidation System, Iowa RCRA Project, 1998 to 2004. Project and Construction Manager**
Responsible for design and installation of pilot ultraviolet (UV) peroxidation system for treatment of ground water associated with former chemical storage facility under USEPA Region VII oversight. Work scope included design, materials specification, project management, and construction management.

**Remedial Action, MGP Site, Indiana, 1998. Technical Advisor and Construction Manager**
Responsible for costing and executing site soil remedial action, including initiation of co-burning at utility power plant. Work scope included excavation, screening, stabilizing, transportation, demolition, and off-site co-burning of soils.

**Ground Water Remediation of TCE, Industrial Facility, South Dakota, 1993. Project Manager**
Managed construction and installation of multiple-well soil and ground water remediation system for addressing TCE impacts at industrial site. Constructed seven-well recovery system, which was combined with vacuum-enhanced pumping system, to achieve hydraulic control and remediate dissolved plume. Reviewed plans and specifications, supervised field activities, provided system start-up services, and prepared operations and maintenance manuals.

**Focused Feasibility Analysis (EECA), Kansas CERCLA Project, 1997. Project Engineer**
Responsible for evaluation, screening, and costing soil and ground water remedial options associated with former chemical storage facility. Work included compilation of focused feasibility study of applicable technologies with cost analysis for the in situ and ex situ treatment of soils and/or ground water remedial actions.

**Remedial Design, Multiple Industrial and Petroleum Facilities, Sites in Iowa, SouthDakota, Nebraska, and Minnesota, 1992 to 1997. Lead Engineer**
Designed, specified, and installed ground water treatment systems, involving air stripping, air injection, soil vapor extraction, and vacuum-enhanced pumping technologies. Responsibilities included compiling pilot testing data, equipment specification, engineering

design, and technical reporting for regulatory agency submittals.

**Feasibility Study Compilation at Former MGP CERCLA Site, Iowa, 1995. Lead Engineer**
Compiled feasibility study for submittal to USEPA Region VII. Presented remedial options for treating PAH-impacted soil and ground water, and recommended bioremediation approach.

**Ground Water Remedial Action, Nebraska CERCLA Project, 1997. Project Engineer**
Responsible for evaluating, screening, and costing ground water remedial options associated with chlorinated solvent contaminants within shallow ground water and area alluvial aquifer. Scope of work included compilation of feasibility study for implementation of multiple ground water remedial actions.

**Bioremediation Field Testing at an Industrial Facility, Kansas RCRA, 1998. Lead Engineer**
Conducted engineering evaluation and compiled design recommendations for bio-cells to treat approximately 45,000 cubic yards of hydrocarbon-impacted soil.

**Bioremediation at an Industrial Facility, State Lead Iowa, 1996. Project Manager and Engineer**
Managed modified landfarm treatment of petroleum-impacted soil for a customer using bioremediation. Supervised field construction and layout of the treatment area. Landfarm accounted for treatment of approximately 3,000 cubic yards of impacted soil.

**Petroleum, Industrial, and Utility Facilities, Iowa, 1990 to 1997. Project Manager**
Coordinated and supervised various assessment activities, such as drilling, sampling, aquifer testing, and modeling. Developed engineering designs, and constructed and installed remediation systems. Also compiled technical reports, permit applications, and budget and cost reports, as well as directed remediation system operations and maintenance.

**Site Assessments of Multiple Petroleum and Industrial Facilities, Sites in Iowa, Nebraska, Minnesota, Illinois, and South Dakota, 1994 to 1999. Project Manager**
Supervised and managed numerous soil and water quality investigations at petroleum service and industrial facilities. Worked with multidisciplinary group, managing field investigation, interpreting soil and water quality data, and compiling final reports.